

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
SOUTHERN DIVISION

UNITED STATES,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 02-2303
)	
MANUEL R. LAGMAY,)	
)	
Defendant.)	

JOINT STATUS REPORT

Plaintiff, United States of America, and Defendant, Manuel R. Lagmay, by their respective counsel file this joint status report in response to the June 24, 2004, letter from Judge Motz.

This is a suit to reduce tax assessments to judgment. The principle issue is the amount of income defendant received in 1988 and the amount of business income received and expenses incurred by a company he owned in the late 1980's and early 1990's.

The Internal Revenue Service recently requested the Department of Justice to file an additional suit against defendant involving many of the same facts and issues as this case. The new suit, or amendment to the complaint, would be to reduce assessments made against defendant under 26 U.S.C. § 6672 for unpaid employment (Form 941) taxes. These employment tax liabilities relate to the same company as defendant's liabilities in this case.

Therefore, the parties believe it would be more efficient, for the Court and the parties, if the complaint in this case is amended rather than bringing an entirely new suit.

The United States requests until July 29, 2004, to file a motion for leave to amend

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the complaint and amended complaint. If this motion is granted, both parties anticipate they would need approximately four months to conduct additional discovery.

Respectfully submitted,

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